

## **Comments Regarding Rural Definition**

Mountain Valleys Health Centers operates six clinics that serve as the only provider of primary health care over an 8,000 square mile area of rural northeastern California. Connectivity is very limited in this mountainous area. We currently utilize three full T-1 lines and one partial T-1 line for administration and telemedicine. Total cost for these lines without USAC subsidy is about \$4,500 per month.

These areas are very rural, in fact frontier, under most definitions. Two of these communities, Burney and Fall River Mills in Eastern Shasta County, would be designated as urban using the federal RUCA definition of rural and therefore not qualify for USAC. RUCA simply does not work in California. These communities are 50 and 70 miles from Redding, the closest city with over 3,000 people, which requires travel via two lane roads over mountain passes that are often closed during the winter.

Designating an entire county as urban because there is one city with 80,000 people simply doesn't work in California or most western states. Counties are larger than many northeastern states leaving small communities very isolated even though there is a large city located in the county.

I request the FCC to be flexible and allow for state definitions that take into account local conditions such as size of counties, geography, etc. The MSSA system for rural definitions in California has been successful for many years.

Regardless of the decision on rural definition, existing sites should be grandfathered to allow existing services to continue.